

**TABLE 1. THE VALUE OF MS. SHAYNA ELLIOTT'S LOST EARNINGS**

YEAR	AGE	WAGES	UNEMPL. EFFECTS	TAXES	JOB MAINT.	ANNUAL INCOME	PRESENT VALUE	CUMULATIVE PV
		(1)	(2)	(3)	(4)	(1- 2- 3- 4)		
<b>Pre-Trial Income:</b>								
2006	-a	24	\$17,110	\$642	\$2,388	\$741	\$13,339	\$13,339
2007		25	35,350	1,241	4,946	1,535	27,628	40,967
2008		26	36,269	1,010	5,113	1,587	28,560	69,527
2009	-b	27	36,740	1,134	5,163	1,602	28,841	98,367
<b>Expected Post-Trial Income:</b>								
2016	-c	34	58,612	2,286	9,913	2,535	43,878	40,568
2017		35	60,078	2,343	10,161	2,598	44,975	80,551
2018		36	61,580	2,402	10,415	2,663	46,100	119,957
2019		37	63,119	2,462	10,676	2,730	47,252	158,795
2020		38	64,697	2,523	10,943	2,798	48,434	197,073
2021		39	66,315	2,586	11,216	2,868	49,644	234,799
2022		40	67,972	2,651	11,497	2,939	50,885	271,980
2023		41	69,672	2,717	11,784	3,013	52,158	308,625
2024		42	71,414	2,785	12,079	3,088	53,462	344,742
2025		43	73,199	2,855	12,381	3,165	54,798	380,338
2026		44	75,029	2,926	12,690	3,245	56,168	415,420
2027		45	76,905	2,999	13,007	3,326	57,572	449,997
2028		46	78,827	3,074	13,333	3,409	59,012	484,074
2029		47	80,798	3,151	13,666	3,494	60,487	517,661
2030		48	82,818	3,230	14,007	3,581	61,999	550,762
2031		49	84,888	3,311	14,358	3,671	63,549	583,387
2032		50	87,011	3,393	14,717	3,763	65,138	615,541
2033		51	89,186	3,478	15,085	3,857	66,766	647,231
2034		52	91,415	3,565	15,462	3,953	68,435	678,464
2035		53	93,701	3,654	15,848	4,052	70,146	709,246
2036		54	96,043	3,746	16,244	4,153	71,900	739,585
2037		55	98,444	3,839	16,650	4,257	73,697	769,486
2038		56	100,906	3,935	17,067	4,364	75,540	798,955
2039		57	103,428	4,034	17,493	4,473	77,428	828,000
2040		58	106,014	4,135	17,931	4,585	79,364	856,626
2041		59	108,664	4,238	18,379	4,699	81,348	884,839
2042		60	111,381	4,344	18,839	4,817	83,382	912,645
2043		61	114,165	4,452	19,309	4,937	85,466	940,050
2044		62	117,019	4,564	19,792	5,061	87,603	967,059
2045		63	119,945	4,678	20,287	5,187	89,793	993,679
2046	-d	64	65,160	2,541	11,021	2,818	48,780	1,007,584

Pre-trial cumulative income of \$98,367 (**Note-b**), plus post-trial cumulative income of \$1,007,584 (assuming retirement at age 64; **Note-d**), totals \$1,105,951

**NOTES:**

- a- Earnings since July 1, 2006, the date Ms. Elliott would have enter the labor force
- b- Earnings to the end of 2009, the date Ms. Elliott would have left the labor force
- c- Expected earnings since January 1, 2016, the time Ms. Elliott would have returned to the labor force
- d- Expected earnings to Ms. Elliott's statistical retirement age of 64



**TABLE 3. THE VALUE OF MS. ELLIOTT'S RECOVERABLE LOST EARNINGS**

<u>YEAR</u>	<u>AGE</u>	<u>PRE-INJURY EARNINGS</u> (Table 1)	<u>MITIGATION EARNINGS</u> (Table 2)	<u>ANNUAL LOSS</u> (1 - 2)	<u>CUMULATIVE LOSS</u>
<b><u>Pre-Trial Losses:</u></b>					
2004	-a	22	\$12,729	-\$12,729	-\$12,729
2005		23	20,011	-20,011	-32,740
2006		24	\$13,339	-1,894	-34,634
2007		25	27,628	27,628	-7,006
2008		26	28,560	28,560	21,553
2009	-b	27	28,841	28,841	50,394
<b><u>Expected Post-Trial Losses:</u></b>					
2016	-c	34	40,568	10,381	10,381
2017		35	39,983	10,231	20,612
2018		36	39,406	10,084	30,696
2019		37	38,838	9,938	40,634
2020		38	38,278	9,795	50,429
2021		39	37,726	9,654	60,083
2022		40	37,182	9,514	69,597
2023		41	36,645	9,377	78,974
2024		42	36,117	9,242	88,216
2025		43	35,596	9,109	97,325
2026		44	35,082	8,977	106,302
2027		45	34,576	8,848	115,150
2028		46	34,078	8,720	123,870
2029		47	33,586	8,594	132,464
2030		48	33,102	8,470	140,934
2031		49	32,624	8,348	149,282
2032		50	32,154	8,228	157,510
2033		51	31,690	8,109	165,619
2034		52	31,233	7,992	173,612
2035		53	30,783	7,877	181,489
2036		54	30,339	7,763	189,252
2037		55	29,901	7,651	196,903
2038		56	29,470	7,541	204,444
2039		57	29,045	7,432	211,877
2040		58	28,626	7,325	219,202
2041		59	28,213	7,219	226,421
2042		60	27,806	7,115	233,536
2043		61	27,405	7,013	240,549
2044		62	27,010	6,912	247,461
2045		63	26,620	6,812	254,272
2046	-d	64	13,905	3,558	257,831

Pre-trial cumulative losses of \$50,394 (**Note-b**), plus post-trial cumulative losses of \$257,831 (assuming retirement at age 64; **Note-d**), total \$308,225

**NOTES:**

**a-** Lost earnings since June 2004

**b-** Lost earnings the end of 2009, the date Ms. Elliott would have left the labor force

**c-** Expected earnings since January 1, 2016, the time Ms. Elliott would have returned to the labor force

**d-** Expected lost earnings to Ms. Elliott's statistical retirement age of 64

**TABLE 4. THE PRESENT VALUE OF MS. ELLIOTT'S LOST HOUSEHOLD SERVICES**

<u>YEAR</u>	<u>AGE</u>	<u>LOST SERVICES</u> (1)	<u>DISABILITY PROBABILITY</u> (2)	<u>NET LOSS</u> (1 - 2)	<u>PRESENT VALUE</u>	<u>CUMULATIVE PV</u>
<b><u>Value of Pre-Trial Losses:</u></b>						
2010	-a	28	\$13,728	\$323	\$13,405	\$13,405
2011		29	13,728	323	13,405	26,811
2012		30	13,728	323	13,405	40,216
2013		31	13,728	323	13,405	53,622
2014		32	12,584	296	12,288	65,910
<b><u>Value of Expected Post-Trial Losses:</u></b>						
2014	-b	32	1,144	27	1,117	1,117
2015		33	14,071	331	13,741	14,329
2016		34	14,423	339	14,084	27,351
2017		35	14,784	347	14,436	40,184
2018		36	15,153	356	14,797	52,833
2019		37	9,884	232	9,652	60,766
2020		38	10,131	238	9,893	68,584
2021		39	10,384	244	10,140	76,290
2022		40	10,644	250	10,394	83,885
2023		41	10,910	256	10,654	91,370
2024		42	11,183	263	10,920	98,747
2025		43	11,462	269	11,193	106,018
2026		44	11,749	276	11,473	113,184
2027		45	12,043	283	11,760	120,247
2028		46	12,344	290	12,054	127,207
2029		47	12,652	297	12,355	134,067
2030		48	12,969	305	12,664	140,829
2031		49	13,293	312	12,980	147,493
2032		50	13,625	320	13,305	154,060
2033		51	13,966	328	13,638	160,533
2034		52	14,315	336	13,979	166,913
2035		53	14,673	345	14,328	173,201
2036		54	15,040	353	14,686	179,398
2037		55	15,416	362	15,053	185,505
2038		56	15,801	371	15,430	191,525
2039		57	16,196	381	15,815	197,457
2040		58	16,601	390	16,211	203,304
2041		59	17,016	400	16,616	209,067
2042		60	17,441	410	17,032	214,747
2043		61	17,877	420	17,457	220,344
2044		62	18,324	431	17,894	225,861
2045		63	18,782	441	18,341	231,299
2046		64	19,252	452	18,800	236,658
2047		65	19,733	464	19,270	241,939
2048		66	20,227	475	19,751	247,145
2049		67	20,732	487	20,245	252,275
2050		68	21,251	499	20,751	257,332
2051		69	21,782	512	21,270	262,315
2052		70	22,326	525	21,802	267,227
2053		71	22,885	538	22,347	272,068
2054		72	23,457	551	22,905	276,839
2055		73	24,043	565	23,478	281,541
2056		74	24,644	579	24,065	286,175
2057	-c	75	3,789	89	3,700	286,860

Pre-trial cumulative losses of \$65,910 (**Note-b**), plus post-trial cumulative losses of \$286,860 (**Note-c**), total \$352,770

**NOTES TO TABLE 4:**

- a- Value of lost household services since January 1, 2010
- b- Based on an assumed trial date of December 1, 2014
- c- Expected value of lost household services until Ms. Elliott reaches age 74.6

**Ms. Elliott's economic loss consists of the following components:**

1) Lost Earnings:	\$ 308,225
2) Value of Lost Household Services:	<u>352,770</u>
Total Economic Loss:	<u><b>\$ 660,995</b></u>